



***de maximis, inc.***

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March 16, 2020

**VIA ELECTRONIC MAIL**

Ms. Diane Salkie  
ATTN: Lower Passaic River Remedial Project Manager  
Emergency and Remedial Response Division  
U.S. EPA, Region 2  
290 Broadway, 19th Floor  
New York, New York 10007

**Re:   *Monthly Progress Report No. 154 – February 2020*  
      *Lower Passaic River Study Area (LPRSA) Remedial Investigation/Feasibility Study*  
      *(RI/FS)*  
      *CERCLA Docket No. 02-2007-2009***

Dear Ms. Salkie:

***de maximis, inc.*** is submitting this Monthly Progress Report for the above-captioned project on the behalf of the RI/FS Agreement Settling Parties (Cooperative Parties Group or CPG) pursuant to the Administrative Settlement Agreement and Order on Consent (Settlement Agreement or AOC). The Progress Report satisfies the reporting requirements of Paragraph 42 of said Settlement Agreement. The CPG has revised this Progress Report to address the Region's direction in its September 1, 2015 letter about Section (d).

**(a) Actions which have been taken to comply with this Settlement Agreement during the previous month.**

**Meetings/Conference Calls**

- On February 12, EPA Region 2 (Region 2) and CPG held a teleconference to discuss CPG clarifications and impressions of the Contaminated Sediment Technical Advisory Group (CSTAG) comments on the Draft Upper 9-Mile Interim Remedy Feasibility Study (IR FS).
- On February 18, Region 2, CPG and New Jersey Department of Environmental Protection (NJDEP) held a conference call to discuss the Draft Upper 9-Mile IR FS definition of source sediments.
- On February 25, Region 2, CPG and NJDEP held a teleconference to discuss recent comments on the Draft Upper 9-Mile IR FS.

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### **Correspondence**

- On February 3, Region 2 and CPG exchanged emails on blue crab parameterization considerations in the Bioaccumulation Model calibration.
- On February 3, Region 2 provided CSTAG recommendations on the Draft Upper 9-mile IR FS to CPG.
- On February 4, CPG provided Region 2 an update on 2019 Current Conditions Biota tissue sample processing status.
- On February 6, CPG provided Region 2 lessons learned from the 2019 Current Conditions Biota Sampling activities.
- On February 7, Region 2 provided responses to CPG's December 20, 2019 responses to Region 2's source definition.
- On February 10 and 11, Region 2 and CPG exchanged emails regarding scheduling shipment of Current Conditions tissue composite samples to Region 2's oversight laboratories.
- On February 12, Region 2 and CPG exchanged emails regarding Bioaccumulation Model calibration status.
- On February 12, CPG provided Region 2 an update on tissue processing status.
- On February 13, Region 2 provided CPG an evaluation of CPG's response to comments on the Draft Upper 9-Mile IR FS.
- On February 18, CPG delivered the January Monthly Progress Report to Region 2.
- On February 18, Region 2 provided NJDEP comments on the Draft Upper 9-Mile IR FS source definition to CPG.
- On February 19, CPG provided pages from Region 2's 2014 Focused Feasibility Study (FFS) and the Basis of Design Report for the 60% Lower 8-Mile Remedial Design dated December 2019 regarding the use of silt curtains to Region 2.
- On February 20, Region 2 provided comments on the lessons learned memorandum from the 2019 Current Conditions Biota Sampling activities dated January 30, 2020 and Region 2's lessons learned from oversight of the 2019 Current Conditions Biota Sampling.
- On February 21, CPG requested Region 2 provide a revised source sediment definition to enable a discussion during the scheduled February 25 teleconference to discuss recent comments on the Draft Upper 9-Mile IR FS.
- On February 24 and 25, Region 2 and CPG exchanged emails regarding a tentative schedule to re-deploy Physical Water Column Monitoring (PWCM) in-water monitoring equipment to complete the Current Conditions 2019 PWCM surveys.
- On February 27, Region 2 provided comments on Appendix D of the Draft Upper 9-Mile IR FS to CPG.

### **Work**

- CPG continued work on supplemental modeling projections for the Draft Upper 9-Mile IR FS.



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- CPG continued reviewing and response to Region 2 comments on the Draft Upper 9-Mile IR FS.
- CPG initiated planning for 2020 in-water equipment deployment of the PWCM component of Current Conditions Sampling.
- CPG continued validation of Current Conditions PWCM and Small Volume Chemical Water Column (SV CWCM) sampling programs.
- CPG continued developing the QAPP for the Current Conditions High Volume (HV) CWCM program.
- CPG continued work on revision and calibration of the Bioaccumulation Model.
- CPG initiated analysis of Current Conditions Sampling Biota composite tissue samples.

**(b) Results of Sampling and Tests**

- On February 18, CPG uploaded Electronic Data Deliverables (EDDs) of validated data from the Current Conditions SV CWCM program events 3 – 6 (September – October 2019); revisions to SV CWCM events 1 and 2 (result qualifiers where “ZJ” was used instead of “EMPC-J”; and PWCM program sampling round 2 (coordinate change for one location) to the EPA SharePoint site.

**(c) Work planned for the next two months with schedules relating to the overall project schedule for RI/FS completion**

- CPG will continue calibration of the Bioaccumulation Model.
- CPG will continue to respond to comments on the Draft Upper 9-Mile IR FS.
- CPG will complete validation of Current Conditions PWCM and SV CWCM data.
- CPG will re-deploy Current Conditions PWCM in-water monitoring equipment.
- CPG will continue supplemental modeling projections for the Draft Upper 9-Mile IR FS.
- CPG will continue analysis of the Current Conditions Biota composite tissue samples.

**(d) Problems encountered and anticipated problems, actual or anticipated delays, and solutions developed and implemented to address actual or anticipated problems or delays.**

- CPG needs to receive Region 2’s responses to the Region 2 comments on the Draft IR FS Appendix H (IR Completion) and Region 2’s responses to the January 31 CSTAG/NRRB Recommendations (received March 3) as soon as possible in order to complete the IR FS in a timely manner.

If you have any questions, please contact Rob Law or me at (908) 735-9315.

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Very truly yours,

**de maximis, inc.**



Willard Potter  
CPG Project Coordinator

cc: Frances Zizila, EPA Region 2 Office of Regional Counsel  
William Hyatt, CPG Coordinating Counsel  
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